



Hon. Paul Calandra
Minister of Environment,
Conversation and Parks
VIA EMAIL:
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Hon. Doug Ford
Premier of Ontario
VIA EMAIL:
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Township of Puslinch
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November 21, 2024

Hon. Matthew Rae, MPP
VIA EMAIL:
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Hon. Ted Arnott, MPP
181 St. Andrew St. East
2nd Floor, Fergus
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Hon. Rob Flack
Minister of Agriculture,
Food, and Agribusiness
VIA EMAIL:
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RE: 10.1 ERO Posting 019-9196 Enabling greater beneficial reuse excess soil

Please be advised that Township of Puslinch Council, at its meeting held on November 20th, 2024 considered the aforementioned topic and subsequent to discussion, the following was resolved:

**Resolution No. 2024-415: Moved by Councillor Hurst and
Seconded by Councillor Sepulis**

**That Council receive the Mayors and Council member updates for information.
Whereas the Ministry of the Environment, Conservation and Parks is currently
consulting on proposed amendments to the Excess Soil Regulation, with potentially
significant implications for local municipalities; and**

**Whereas these proposed changes, including landfilling restrictions and exemptions for
waste environmental compliance approvals, pose substantial risks to environmental**



**integrity, groundwater protection, local enforcement efforts, and land use planning;
and**

**Whereas the proposed amendments may undermine local municipalities' ability to effectively manage excess soil, potentially leading to adverse environmental impacts, such as soil and/or groundwater contamination and disruption of local ecosystems;
and**

Whereas the relaxation of regulatory requirements for soil management could further hinder the enforcement capabilities of municipal authorities, making it more challenging to monitor and address compliance issues, thus jeopardizing public health and safety; and

Whereas the proposed regulations do not provide sufficient clarity regarding whether the intent of the proposed regulations are to permit ARA licensed sites to be used as reuse sites for excess soil; and

Whereas the proposed flexibility in soil reuse standards could conflict with established land use planning frameworks, potentially resulting in incompatible land uses and further strain on local infrastructure; and

Whereas the introduction of regional mapping for areas with naturally occurring exceedances presents significant financial challenges for municipalities, as the costs associated with implementing such mapping projects may not be feasible given limited budgets and resources; and

Whereas relaxing excess soil regulations and implementing regional mapping could negatively impact agricultural lands by allowing excess soil to be disposed of in ways that diminish the quality and usability of these valuable lands for future agricultural purposes, highlighting the need to prioritize the protection of agricultural lands equally with infrastructure projects and housing developments;

Therefore, be it resolved that the Council of Township of Puslinch formally objects to the proposed amendments to the Excess Soil Regulation, citing concerns regarding the detrimental effects on local municipalities, the environment, soil and groundwater quality protection, and effective land use planning; and



That the Council of Township of Puslinch directs staff to forward this resolution to the Ministry of the Environment, Conservation and Parks, outlining these concerns and advocating for a more balanced approach that prioritizes environmental protection, local governance, and the protection of resident's health and safety; and further,

That this resolution be shared with all Ontario Municipalities, the Premier of Ontario; County Planning staff, MPP Arnott; MPP Rae; the Wellington Federation of Agriculture; and OMAFRA requesting support for the protection of agricultural lands and sustainable excess soil management practices in Ontario.

CARRIED

As per the above resolution, please accept a copy of this correspondence for your information and consideration.

Sincerely,

Justine Brotherston
Municipal Clerk

CC: All Ontario Municipalities, County of Wellington Planning Staff, Wellington Federation of Agriculture, Executive Director of TAPMO